

**Change Sheet for the Los Angeles River and Tributaries Metals TMDLs Basin Plan Amendment Language**

Page	Location	Action	Added or Deleted Text	Reason for Change.
	BPA	Correct	Correct minor typographical errors throughout the BPA and Staff Report.	For clarification.
1	BPA	Add	To the List of Figures, Tables and Inserts, add: <u>Table 7-13.3 Los Angeles River and Tributaries Metals TMDL: Jurisdictional Groups.</u>	This table is added to address comments that the TMDL should recognize political and hydrological differences between the various subwatersheds of the River. It also addresses concerns about which area would be chosen to comply with the first compliance milestone at year 6. The compliance milestone is now distributed among the five jurisdictional groups.
3, 5, 6, 8, 9	BPA	Add	Add words “Reach 1” after “Rio Hondo” in the dry-weather numeric targets, dry-weather loading capacity, dry-weather direct air deposition LAs, dry-weather storm water WLAs, and dry-weather “other NPDES permits” WLAs tables.	To clarify that numeric targets, loading capacity, load allocations for direct air deposition, storm water WLAs, and WLAs for other NPDES permits do not apply to the entire Rio Hondo during dry weather. This change is in response to comments and recognizes the fact that Reaches 2 and 3 are not impaired and that little or no flow enters Reach 1 during dry weather.
3	BPA	Replace	Replace word “Ca” with “Cd” in Wet-weather numeric target table.	For clarification
5	BPA	Delete	Delete strikethrough: “Wet weather loading capacities are based on a load duration curve approach. Loading capacities...”	To clarify that curves are not presented in the loading capacity section.
8	BPA	Add and delete	Add “Other NPDES Permits” heading with asterisk defining “other NPDES permits”  Add underline words, delete strikethrough: “Concentration-based dry-weather waste load	For better organization.  This change clarifies that WLAs are not assigned to other NPDES permits in the entire Rio Hondo, just Reach 1.

Change Sheet –  
Los Angeles River and Tributaries Metals TMDLs

Page	Location	Action	Added or Deleted Text	Reason for Change.
			allocations apply to the other NPDES permits that discharge to the <u>reaches and tributaries in the following table Los Angeles River and Tributaries.</u>	
10, 11	BPA	Add	Add underline text: <u>“Waste load allocations for the grouped storm water permittees apply to all reaches and tributaries.”</u> Add underline text: <u>“all reaches of the Los Angeles River and its tributaries.”</u>	This is to clarify that because all reaches and tributaries drain to Reach 1 in wet-weather, all reaches and tributaries must receive wet-weather waste load allocations.
11	BPA	Add	Add “Other NPDES Permits” heading with asterisk defining “other NPDES permits”.	For better organization.
12	BPA	Add	Add underline text: <u>“If a POTW demonstrates that advanced treatment (necessitating long design and construction timeframes) will be required to meet final waste load allocations, the Regional Board will consider extending the implementation schedule to allow the POTW up to 10 years from the effective date of the TMDL to achieve compliance with the final WLAs.”</u>	This language is added to be consistent with the language in the implementation Table 7-13.2, 4 <sup>th</sup> row.
12, 19	BPA	Add	Add underline words <u>“Permittees that hold individual NPDES permits and solely discharge storm water may be allowed (at Regional Board discretion) compliance schedules up to 10 years from the effective date of the TMDL to achieve compliance with final WLAs.”</u>	This allows individual NPDES permits for storm water the same compliance period as the general storm water permits. This change acknowledges staff’s intent to enroll many of the individual NPDES permits for storm water into the watershed-specific general storm water permit, upon adoption of the general permit.
12, 13, 19, 20	BPA	Add	Delete strikethrough: “General industrial <del>and</del> <del>construction</del> storm water permits”.	This change is made because staff has drafted separate implementation language for construction storm water permits.

Change Sheet –  
Los Angeles River and Tributaries Metals TMDLs

Page	Location	Action	Added or Deleted Text	Reason for Change.
12	BPA	Add	Add “Dry-weather implementation” heading and underline text: <u>“Non-storm water flows authorized by Order No. 97-03 DWQ, or any successor order, are exempt from the dry-weather waste load allocation equal to zero. Instead, these authorized non-storm water flows shall meet the reach-specific concentration-based waste load allocations assigned to the “other NPDES permits”. The dry-weather waste load allocation equal to zero applies to unauthorized non-storm water flows, which are prohibited by Order No. 97-03 DWQ.”</u>	This language is added in response to comments and to recognize that dry-weather flows are already regulated by the general permit. One of the general permit conditions is that the discharge may not contribute to an exceedance or violation of water quality standards. Assigning the same dry-weather WLAs as the “other NPDES permits” to these dry-weather flows provides insurance that the flows will not contribute to or cause an exceedance of CTR.
12	BPA	Add	Delete strikethrough: “It is anticipated that the dry-weather waste load allocations <del>equal to zero</del> will be implemented.”	This change is in conformance with the above-mentioned change.
12, 17	BPA	Move	Delete strikethrough on page 12: <del>“The general industrial storm water permit shall contain a model monitoring and reporting program to evaluate BMP effectiveness. A permittee enrolled under the general permit shall have the choice of conducting individual monitoring based on the model program or participating in a group monitoring effort. MS4 permittees are encouraged to take the lead in group monitoring efforts for industrial facilities within their jurisdiction because compliance with waste load allocations by these facilities will in many cases translate to reductions in metals loads to the MS4 system.”</del> Move to page 17 under “TMDL Effectiveness Monitoring”.	For better organization.
13	BPA	Add	Add “Wet-weather implementation” heading.	For better organization.
13	BPA	Replace	Replace words “limits” with “conditions”	This is in response to comments and in order to clarify the intent that wet-weather WLAs will be implemented as BMPs.

Change Sheet –  
Los Angeles River and Tributaries Metals TMDLs

Page	Location	Action	Added or Deleted Text	Reason for Change.
13	BPA	Add	Add underline text: <u>“It is anticipated that monitoring results and any necessary BMP improvements would occur as part of an annual reporting process.”</u>	This reflects staff intent that the iterative BMP process should occur at a regular frequency within the permit cycle.
13	BPA	Add	Add underline text: <u>“Compliance with permit conditions may be demonstrated through the installation, maintenance, and monitoring of Regional Board-approved BMPs. If this method of compliance is chosen, permit writers must provide adequate justification and documentation to demonstrate that BMPs are expected to result in attainment of interim waste load allocations.”</u>	This is in response to comments and in order to clarify the intent that wet-weather WLAs will be implemented as BMPs.
13	BPA	Replace	Delete strikethrough text: <del>“Concentration-based permit limits may be set to achieve the mass-based waste load allocations. These concentration-based limits would be equal to the concentration-based waste load allocations assigned to the other NPDES permits. Permittees shall comply with final waste load allocations no later than 10 years from the effective date of the TMDL.”</del> Replace with underline text: <u>“The general industrial storm water permits shall achieve final wet-weather waste load allocations no later than 10 years from the effective date of the TMDL, which shall be expressed as NPDES water quality-based effluent limitations. Effluent limitations may be expressed as permit conditions, such as the installation, maintenance, and monitoring of Regional Board-approved BMPs if adequate justification and documentation demonstrate that BMPs are expected to result in attainment of waste load allocations.”</u>	This is response to comments and in order to clarify the intent that wet-weather WLAs will be implemented as BMPs.

Change Sheet –  
Los Angeles River and Tributaries Metals TMDLs

Page	Location	Action	Added or Deleted Text	Reason for Change.
14	BPA	Add	Add new heading: “General construction storm water permits” and new implementation language for dry and wet-weather waste load allocations.	This is in response to comments about the short timeframe and high turnover of construction projects. The added language recognizes that industry-wide compliance efforts are better than a site-specific BMP and monitoring program to address these short-term projects.
15	BPA	Replace	Delete strikethrough, add underline text: “ <del>with compliance to be achieved in prescribed percentages of the watershed, with total compliance to be achieved within 22 years.</del> <u>The watershed is divided into five jurisdictional groups based on the subwatersheds of the tributaries that drain to each reach of the river, as presented in Table 7-13-3. Each jurisdictional group shall achieve compliance in prescribed percentages of its subwatershed(s), with total compliance to be achieved within 22 years.</u> ”	This language is changed to address comments that the TMDL should recognize political and hydrological differences between the various subwatersheds of the River. It also addresses concerns about which area would be chosen to comply with the first compliance milestone at year 6. The compliance milestone is now distributed among the five jurisdictional groups.
16	BPA	Add	Add underline text: “The MS4 and Caltrans storm water NPDES permittees <u>in each jurisdictional group</u> are jointly responsible for implementing the ambient monitoring program.”	This change is in conformance with the above-mentioned change.
16	BPA	Add and Replace	Under TMDL Effectiveness Monitoring, The MS4 and Caltrans storm water NPDES permittees <u>in each jurisdictional group</u> are jointly responsible for assessing progress in reducing pollutant loads to achieve the TMDL. <del>The MS4 and Caltrans storm water NPDES permittees are</del> <u>Each jurisdictional group is required to submit for approval by the Executive Officer...</u>  Replace “the watershed” with “each subwatershed”	These changes are in conformance with the above-mentioned change.

Change Sheet –  
Los Angeles River and Tributaries Metals TMDLs

Page	Location	Action	Added or Deleted Text	Reason for Change.
19	BPA	Delete	Under “General Industrial Storm Water Permits”, first row, delete the words “of zero”	To reflect the changes made to dry-weather implementation on page 12.
19	BPA	Add	Under “General Industrial Storm Water Permits”, first row, add: <u>“Effluent limitations may be expressed as permit conditions, such as the installation, maintenance, and monitoring of Regional Board-approved BMPs.”</u>  Add: <u>“BMP effectiveness monitoring will be implemented to determine progress in achieving interim wet-weather waste load allocations.”</u>	This is in response to comments and in order to clarify the intent that wet-weather WLAs will be implemented as BMPs.  To clarify that the iterative BMP process to meet interim waste load allocations begins upon permit issuance, renewal, or re-opener.
20	BPA	Add and Replace	Under “General Industrial Storm Water Permits”, second and third rows, add underline, delete strikethrough: <u>“Effluent limitations may be expressed as permit conditions, such as the installation, maintenance, and monitoring of Regional Board-approved BMPs.</u> Permittees shall <del>allow for begin</del> an iterative BMP process including BMP effectiveness monitoring to achieve compliance with final waste load allocations <del>permit requirements</del> .	This is response to comments and in order to clarify intent that wet-weather WLAs will be implemented as BMPs and to clarify that the iterative BMP process to meet final waste load allocations begins five years from the effective date of the TMDL.
21	BPA	Add	Add new heading: “General construction storm water permits” and new implementation language for dry and wet-weather waste load allocations.	This is in response to comments about the short timeframe and high turnover of construction projects. The added language recognizes that industry-wide compliance efforts are better than a site-specific BMP and monitoring program to address these short-term projects.
21	BPA	Add and Replace	Under MS4 and Caltrans Storm Water Permits, first row: “In response to an order issued by the Executive Officer, <del>the MS4 and Caltrans storm</del>	This change is in conformance with the changes on page 15.

Change Sheet –  
Los Angeles River and Tributaries Metals TMDLs

Page	Location	Action	Added or Deleted Text	Reason for Change.
			<del>water NPDES permittees each jurisdictional group must submit a coordinated monitoring plan.... The MS4 and Caltrans storm water permittees may elect to identify jurisdictional groups to coordinate monitoring efforts."</del>	
21	BPA	Add and Replace	Under MS4 and Caltrans Storm Water Permits, second row: <del>"Each jurisdictional group The MS4 and Caltrans storm water NPDES permittees shall provide a written report to the Regional Board outlining the drainage areas to be addressed and how these areas the subwatersheds within the jurisdictional group will achieve compliance with the waste load allocations."</del>	This change is in conformance with the changes on page 15.
21	BPA	Replace	Replace "12 months" with "15 months" in first row under MS4 and Caltrans Storm Water Permits.	In response to comments to extend the deadline for the monitoring program.
21	BPA	Replace	Replace "12 months" with "18 months" and "16 months" with "24 months" in second row under MS4 and Caltrans Storm Water Permits.	In response to comments to extend the deadline for an implementation plan.
22	BPA	Replace	Under MS4 and Caltrans Storm Water Permits, rows 3,4,5,and 6, replace "The MS4 and Caltrans storm water NPDES permittees" with "each jurisdictional group." dd the word "group's" before the words "total drainage area".	This change is in conformance with the changes on page 15.
23	BPA	Add	Add Table 7-13.3 Los Angeles River and Tributaries Metals TMDL: Jurisdictional Groups.	This change is in conformance with the changes on page 15.